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May 29, 2020

Jude Daye, Executive Assistant
Blue Cross and Blue Shield of Vermont
445 Industrial Lane
Montpelier, VT 05601

Re: The Vermont Health Plan
3Q 2020 LG Rating Program Filing
SERFF Tracking #: BCVT-132350492

Dear Jude Daye:

The following question is being asked on behalf of the HCA.

Questions:

1. Please identify instances, if any, of deviations of more than 10% from the approved 2020 manual rate for large groups in these books of business, separately for BCBSVT and TVHP. For each instance of +/- 10% deviation from the approved manual rate, provide the magnitude of the deviation that is attributable to discretion as opposed to group experience and/or credibility as detailed in the rate filing.

Please be aware that we expect to have further questions regarding the filing as the review continues.

To ensure that the review of your filing has been completed before statutory deadlines, we expect you to respond as expeditiously as possible to every objection in our letter, but no later than June 5, 2020. Note that the responses can be submitted separately and do not have to be submitted all at the same time.

We trust that you understand these forms may not be used in Vermont until they are formally approved by the GMCB.

Sincerely,

Kevin Ruggeberg, ASA, MAAA
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